



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

ACT/015/032
File #2
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April 13, 1988

TO: File

FROM: James Leatherwood, Reclamation Soils Specialist *[Signature]*

RE: Five-Year Permit Renewal Review, Genwal Coal Company,
Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County,
Utah

The above-mentioned Permit Application Package (PAP), submitted February 16, 1988, has been reviewed and found not to be complete or technically adequate. The following items must be addressed.

Determination of Completeness

UMC 771.23 Permit Applications: General Requirements for Format and Content - JSL

The Table of Contents, page 2-2 of Chapter 2, must be updated. The Table of Contents refers to Plate 2-3. Plate 2-3 has been deleted from the PAP. Please update the Table of Contents.

UMC 784.11 Operation Plan: General Requirements - JSL

Section 3.2.10, page 3-10, states that the Class III road is leading to the substation pad. This pad is not a substation pad.

Under Section 3.2.10, page 3-10, the PAP inaccurately refers to the Class III road as leading to the transformer pad, when in fact the road actually leads to the powder magazine pad. Please update the PAP to reflect the actual pad use.

Section 3.3.5.2 should be updated to include the gate at the entrance of the Class III road, as delineated on Plate 3.1.

Section 3.2.10 refers to Figure 3.1. Figure 3.1 was not included in the PAP. Please submit Figure 3.1.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance - JSL

Figure 7-20, page 7-78, fails to identify all surface and ground water stations. According to the Table of Contents, the heading of Figure 7-20 is "Location of Surface and Ground Water Monitoring Stations", not "Location of Surface Water Monitoring Stations", as presented in Figure 7-20. Please amend.

UMC 784.23 Operation Plan: Maps and Plans - JSL

Plate 7.5 inaccurately identifies a bathhouse facility located on the mine parking lot pad. The PAP also discusses the development of a bathhouse facility underground. Please clarify and resubmit Plate 7.5, if the plate is inaccurate.

Section 3.2.3, page 3-7, states that three trailers will be located onsite. The surface facilities map, Plate 3-1, does not identify these facilities. Please update Plate 3-1 or clarify the content of the PAP.

Technical Adequacy

UMC 817.23 Topsoil: Storage - JSL

Page 8-6, Section 8.7, states that the volume of Topsoil Stockpile Three will be evaluated and submitted after construction. This information was not included in the PAP. Please submit the actual volume of stockpiled topsoil/subsoil in Stockpile Three.

UMC 817.24 Topsoil: Redistribution - JSL

Section 8.6, page 8-6, states "A six-inch layer of topsoil on steep slopes may be lost to erosion and require replacement." This is clearly not acceptable. All topsoil materials shall be redistributed in a manner that protects the topsoil from erosion. If erosion is occurring, stabilization practices must be implemented expeditiously. Soil protection measures may include tacking down a mulch blanket. The PAP must clarify this issue.

UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL

There is an inconsistency with the fertilizer management plan described in the PAP. Section 8.9, page 8-10, states that the fertilizer will be broadcast after topsoil redistribution in late September or October. Section 3.5.6.1, page 3-45, states that the

topsoil will be amended prior to redistribution. The Division concurs with plans to redistribute the fertilizer in September or early October after topsoil redistribution. The applicant should commit not to fertilize from late October to early April because of the increased possibility of surface water degradation occurring from excess available nutrients. Please amend the PAP accordingly.

UMC 817.41 Hydrologic Balance: General Requirements - JSL

Section 7.2.4 does not discuss the underground mine water discharge into Crandall Creek. This section only discusses the discharge from the sediment pond. Section 7.2.4 must be updated to include the underground mine water discharge into Crandall Creek.

UMC 817.49 Hydrologic Balance: Permanent And Temporary Impoundments - JSL

Appendix 7-10, Sedimentation Pond Calculations (As-builts), does not include a discussion on the following:

- 1) Existing and required monitoring procedures and instrumentation.
- 2) The elevation of any impounded water at the time of report.
- 3) A discussion of any fires occurring in the construction material up to the date of certification.
- 4) A discussion of any other aspects of the dam or embankment affecting stability.

The above outlined items must be included in the certification report by a registered professional engineer.

jr
cc: S. Linner
R. Summers
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